

From: Bob Werlin [rwerlin@kwplaw.com]
Sent: Wednesday, June 04, 2003 12:10 PM
To: kathy.savino@verizon.com; Cottrell, Mary (DPU); Chin, Tina (DPU); Isenberg, Mike (DPU); william.agee@state.ma.us; Adhanom, Berhane (DPU); jee.soo.hong@state.ma.us; Allen, Peter (DPU); Conklin, Debra (DPU); marcella.hickey@state.ma.us; sbaldwin@attbi.com; rwerlin@kwplaw.com; karlen.reed@ago.state.ma.us; ekrathwohl@richmaylaw.com; craig.d.dingwall@mail.sprint.com; jegruber@lga.att.com; jjones@palmerdodge.com; ksalinge@palmerdodge.com; kdavenport@palmerdodge.com; apetrilla@covad.com; amandl@conversent.net; ssawyer@conversent.com; wdurand@necta.ipmail.att.net; dougdb@rnktel.com; dsussman@nas-corp.com; rjoyce@shb.com; robert.ganton@hqda.army.mil; richard.fipphen@wcom.com; prubino@z-tel.com; gford@z-tel.com; jcanis@kelleydrye.com; jcornblatt@servisense.com; tconnor@kelleydrye.com; mhazzard@kelleydrye.com; karen.nations@xo.com; aisar@millerisar.com; bkeener@brahmacom.com; terry.romine@adelphiacom.com; cfkerry@mintz.com; pjmacres@swidlaw.com; ejbranfman@swidlaw.com; rsommi@broadviewnet.com; abataille@broadviewnet.com; bruce.p.beausejour@verizon.com; barbara.landry@verizon.com; Efiling, Dte (dpu)
Subject: RE: MA 01-20 TELRIC -- Verizon MA's Response to AT&T Comments on Motion to Modify the Procedural Schedule

Verizon hereby responds briefly to AT&T's objection to Verizon MA's request to modify the procedural schedule in this case. For the reasons set forth in the Motion, Verizon MA's request is both modest and reasonable by any rationale measure. Verizon MA is working diligently to complete the work quickly and accurately, and the short delay requested will have no adverse impact on any party.

AT&T's schedule exhibits a fundamental misunderstanding about what needs to be done. Its schedule would have Verizon MA submitting recurring and non-recurring charges before the cost studies are completed. This is impossible, since the results of the cost studies are used to develop the individual charges. Until the costs are computed, there is no way to revise the rates and charges. The schedule proposed by Verizon MA, with a two-day delay in filing the cost studies, and then the filing of the tariffs and rates shortly thereafter, is reasonable and the best that can be done. The motion should be approved.

Bob Werlin
Keegan, Werlin & Pabian, LLP
21 Custom House Street
Boston, MA 02110
Phone: 617-951-1400
Fax: 617-951-1354

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